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Tierra Solutions

March 3, 2003

U.S. Environmental Protection Agency, Region II
Emergency and Remedial Response Division
290 Broadway, 19th Floor, Room W-20
New York, NY 10007-1866

Attention: Mr. Richard P. Winfield
Remedial Project Manager

Subject: Response to Comments provided by NJDEP, PVSC, and GLEC
Combined Sewer Overflow Investigation
Final Work Plan/Field Sampling Plan and Quality Assurance Project Plan
Passaic River Study Area
Administrative Order on Consent Index No. II-CERCLA-0117

Dear Mr. Winfield:

Please find enclosed with this letter Tierra's responses to comments provided by New Jersey Department of Environmental Protection (NJDEP); Passaic Valley Sewage Commissioners (PVSC); and Great Lakes Environmental Center (GLEC), as consultant to PVSC. These comments were received by Tierra as follows:

- NJDEP Comments: forwarded by EPA to Tierra on October 25, 2002.
- PVSC and GLEC: received by direct copy from PVSC on October 30, 2002.

Per EPA's instructions, Tierra did not develop responses to these comments until instructed to do so on January 14, 2003, during a telephone conversation between you and I.

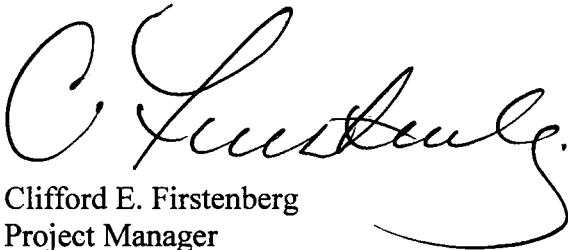
Listed on the following page are documents prepared by Tierra as a result of a review of the above-referenced comments. Following items 4 through 8 are instructions for incorporating these documents into the Combined Sewer Overflow (CSO) Work Plan/Field Sampling Plan (WP/FSP) and Quality Assurance Project Plan (QAPP). This will result in an up-to-date document set that is responsive to the reviewers' comments, as described in Tierra's responses.



1. Responses to NJDEP's comments
2. Responses to PVSC's comments
3. Responses to GLEC's comments
4. Revised pages for the May 2002 WP/FSP and QAPP resulting from the above-referenced comments [*page 5-2 replaces the existing page in Volume 1; pages 3-38, 3-39, and 9-9 replace the existing pages in Volume 2 (QAPP)*]
5. Modified Standard Operating Procedure (SOP) No. 3 resulting from the above-referenced comments [*replaces the existing SOP No. 3 in Volume 1*]
6. New SOP No. 8 [*add to end of Volume 1 with blue "Appendix 10" separator page*]
7. New SOP No. 9 [*add to end of Volume 1 with blue "Appendix 11" separator page*]
8. Revised page 2 of Table of Contents [*3 copies are provided; replace appropriate page in each table of contents in each of volumes 1, 2, and 3*]

Please let me know if there are any questions regarding these responses or the modifications to the WP/FSP and QAPP.

Sincerely,



Clifford E. Firstenberg
Project Manager
On behalf of Occidental Chemical Corporation
(as successor to Diamond Shamrock Chemicals Company)

Enclosures

1. Responses to NJDEP's comments
2. Responses to PVSC's comments
3. Responses to GLEC's comments
4. Revised pages for the May 2002 WP/FSP and QAPP
5. Modified SOP No. 3
6. New SOP No. 8
7. New SOP No. 9
8. Revised page 2 of Table of Contents (3 copies)

Mr. R. Winfield
Response to Comments – CSO Investigation
March 3, 2003
Page 3

- 2c: Section Chief
NJDEP-Bureau of Federal Case Management
401 East State Street - CN 028
Trenton, NJ 08625-0028
Attn: Jonathan D. Berg
- 1c: Chief, New Jersey Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency
290 Broadway, 19th Floor, Room W-20
New York, NY 10007-1866
Attention: Diamond Alkali Site Attorney - Passaic River Study Area